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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 DEXTER HUBERT WHITE

14 Plaintiff,

15 V.

16 CITY OF LOS ANGELES, LOS
17 ANGELES POLICE
18 DEPARTMENT, COUNTY OF LOS
19 ANGELES, OFFICER CORY
20 MCMICHAEL , OFFICER JAVIER
21 TAFOYA, and DOES 1 to 10,
22 inclusive,
23 Defendants.

Case Number:

PLAINTIFF'S COMPLAINT
FOR DAMAGES:

1. Violation of Defendant's Civil Rights 42 U.S.C § 1983- Excessive Force (Individual Liability and Monell Claim)
2. Violation of California Civil Code §§ 43, 52.1; California Constitution Article 1 § 13
3. Assault and Battery

[JURY TRIAL DEMAND]

1 **PRELIMINARY STATEMENT**

2 This is a civil rights action for money damages arising from the
3 unreasonable shooting of DEXTER HUBERT WHITE on January 11, 2018, in
4 Los Angeles, California, against all defendants for violations of California tort
5 law and United States constitutionally guaranteed rights. DEXTER HUBERT
6 WHITE hereby asserts and alleges as follows:

7 **JURISDICTION AND VENUE**

8 1. This action is brought pursuant to 42 U.S.C. § 1983 & 1988 and the
9 Fourth and Fourteenth Amendments to the United States Constitution. This court
10 has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343. This court has
11 supplemental jurisdiction over plaintiff's state law claims pursuant to 28 U.S.C. §
12 1367.

13 2. At all relevant times to the facts underlying the present complaint,
14 Plaintiff DEXTER HUBERT WHITE (hereinafter "Plaintiff") is and was a resident
15 of Los Angeles, California, at the time of the allegations set forth herein.

16 3. Venue is proper in the Central District of California under 28
17 U.S.C. § 139(a) and (b).

18 **PARTIES**

19 4. Plaintiff, DEXTER HUBERT WHITE brings his Claim under 42 U.S.C. §
20 1983 for deliberate indifference to his constitutionally protected interests. Plaintiff
21 brings his claim under 42 U.S.C §1983 for violations of his Constitutional rights.

22 5. Defendant COUNTY OF LOS ANGELES (hereinafter "COUNTY")
23 is and at all times mentioned herein was, a municipal corporation or political
24 subdivision of the United States organized and existing under the laws of the State
25 of California. Defendant COUNTY has possessed the power and authority to adopt
26 policies and prescribe rules, regulations and practices affecting the operation of the
27 COUNTY.

28 6. Defendant LOS ANGELES POLICE DEPARTMENT, (hereinafter

1 “LAPD”) is and at all times mentioned herein was, a municipal corporation or
2 political subdivision of the United States organized and existing under the laws of
3 the State of California.

4 7. Defendant CITY OF LOS ANGELES (hereinafter “CITY OF
5 LOS ANGELES”) is and at all times mentioned herein was, a municipal
6 corporation or political subdivision of the United States organized and existing
7 under the laws of the State of California. Defendant CITY OF LOS ANGELES has
8 possessed the power and authority to adopt policies and prescribe rules, regulations
9 and practices affecting the operation of the LAPD, and particularly said
10 Department’s training, tactics, methods, practices, customs and usages related to
11 internal investigations, personnel supervision and records maintenance, the use and
12 deployment of dangerous weapons, and the use of force.

13 8. In this case, the COUNTY and CITY OF LOS ANGELES acted through
14 its agents, employees, and servants, including the policymakers for
15 defendant LAPD, and through defendant LOS ANGELES POLICE OFFICER
16 CORY MCMICHAEL AND OFFICER JAVIER TAFOYA. Defendant CORY
17 MCMICHAEL and DEFENDANT JAVIER TAFOYA were officers of LAPD at
18 the time of the facts alleged in this Complaint and were employed by LAPD at all
19 times relevant to the Complaint.

20 9. At all relevant times, Defendants COUNTY, CITY, and LAPD and each
21 of them, possessed the power and authority to adopt policies and prescribe rules,
22 regulations, and practices affecting all facets of the training, supervision, control,
23 employment, assignment and removal of individual members of the LAPD,
24 including those individuals charged with protecting the health and safety of the
25 public, including Plaintiff DEXTER HUBERT WHITE, and to assure that said
26 actions, policies, rules, regulations, customs, practices and procedures of the
27 LAPD and its employees and agents complied with the laws and constitutions of
28 the United States and the State of California. At all relevant times, the COUNTY
and CITY were the employers of each of the individually named defendants.

1 10. Defendant OFFICER CORY MCMICHAEL (“Cory McMichael”) was
2 at all times relevant to this complaint an officer with the LOS ANGELES POLICE
3 DEPARTMENT. At all relevant times, OFFICER CORY MCMICHAEL was a
4 duly authorized employee and agent of the COUNTY AND CITY, subject to
5 oversight and supervision by the COUNTY’S AND CITY’S elected and non-
6 elected officials, and was acting under color of law and within the course and
7 scope of his duties as an officer for the LOS ANGELES POLICE DEPARTMENT
8 and with complete authority and ratification of the principal, COUNTY and CITY.
9 In committing the acts alleged herein, OFFICER CORY MCMICHAEL acted
10 within the scope of his respective employment and under color of law. OFFICER
11 CORY MCMICHAEL is sued in both his official and individual capacities.

12 11. Defendant OFFICER JAVIER TAFOYA (“Javier Tafoya”) was at all
13 times relevant to this complaint an officer with the LOS ANGELES POLICE
14 DEPARTMENT. At all relevant times, OFFICER JAVIER TAFOYA was a duly
15 authorized employee and agent of the COUNTY AND CITY, subject to oversight
16 and supervision by the COUNTY’S AND CITY’S elected and non-elected
17 officials, and was acting under color of law and within the course and scope of his
18 duties as an officer for the LOS ANGELES POLICE DEPARTMENT and with
19 complete authority and ratification of the principal, COUNTY and CITY. In
20 committing the acts alleged herein, OFFICER JAVIER TAFOYA acted within the
21 scope of his respective employment and under color of law. OFFICER JAVIER
22 TAFOYA is sued in both his official and individual capacities.

23 12. On July 10, 2018, a timely claim for damages was filed with
24 the COUNTY and CITY OF LOS ANGELES in substantial compliance with
25 California Government Code § 910, et seq. Plaintiff’s claims were rejected.

26 13. Plaintiff is informed and believes and thereon alleges that Defendants
27 sued herein as DOES 1 through 10, inclusive, were employees of the COUNTY or
28 CITY, and were at all relevant times acting in the course and scope of their
employment and agency. Each Defendant is the agent of the other. Plaintiff alleges

1 that each of the Defendants named as a "DOE" was in some manner responsible
 2 for the acts and omissions alleged herein, and Plaintiff will ask leave of this Court
 3 to amend the Complaint to allege such names and responsibility when that
 4 information is ascertained. Each individually named Doe defendant, like each
 5 individually named defendant, acted under color of law and within the scope of his
 6 or her agency and employment with the County or City. Each Doe is sued in both
 7 his/her official and individual capacities.

8 **FACTS COMMON TO ALL CAUSES OF ACTION**

9 14. This complaint concerns an officer involved shooting which
 10 occurred on January 11, 2018 at or near 40th place and Walton Avenue in Los
 11 Angeles, CA.

12 15. On the aforementioned date, DEXTER HUBERT WHITE was
 13 visiting his music managers home. After a brief oral argument with the music
 14 manager, police were dispatched to the scene. Upon arrival, police investigated the
 15 911 call and the music manager notified police that everything was fine. As police
 16 saw DEXTER HUBERT WHITE on the street, they proceeded to quickly stop him
 17 and draw their weapons on him. Without giving DEXTER HUBERT WHITE any
 18 opportunity to react, police proceeded to shoot DEXTER HUBERT WHITE only
 after a few seconds of drawing their weapons.

19 16. DEXTER HUBERT WHITE was shot multiple times by LAPD
 20 officers. Officer CORY MCMICHAEL and officer JAVIER TAFOYA were
 21 identified as two of the shooting officers.

22 17. DEXTER HUBERT WHITE had no weapons in his possession and
 23 posed no threat to officers or the public. Despite the fact that WHITE had no
 24 weapons and posed no threat, officers nonetheless shot him several times.

25 18. Officers, whose names are unknown at this time and are herein sued
 26 as DOES 1-10 inclusive, were employed by and acting in the course and scope of
 27 their employment with the COUNTY and CITY. Without warning, the officers,
 28 sued herein as DOES 1-10 inclusive and Officers CORY MCMICHAEL and

1 JAVIER TAFOYA repeatedly and unjustifiably discharged their department issued
2 firearm at the person of DEXTER HUBERT WHITE, inflicting multiple gunshot
3 wounds. At no time during the course of these events did DEXTER HUBERT
4 WHITE pose any reasonable threat of violence to the officers, nor did he do
5 anything to justify the force used against him, and the same was excessive,
6 unnecessary, and unlawful. DEXTER HUBERT WHITE had suffered extensive
7 damage from these multiple gunshot wounds. DEXTER HUBERT WHITE
8 currently has limited motor functions in his left arm and hand and has had to get
9 surgery for the injuries. The injuries sustained by DEXTER HUBERT WHITE are
10 a direct and proximate result of gunshot wounds inflicted upon his person by
11 Officer CORY MCMICHAEL, Officer JAVIER TAFOYA and DOE Defendants.

12 19. Both prior to and during the time in which he was shot, DEXTER
13 HUBERT WHITE posed no threats, made no aggressive movements, no furtive
14 gestures, and no physical movements which would suggest to a reasonable officer
15 that he had the will, or the ability to inflict substantial bodily harm against any
16 individual.

17 20. Both prior to and during the time in which Defendants, and each
18 of them, shot DEXTER HUBERT WHITE, Defendants individually, were not
19 faced with any circumstances which would have led a reasonable officer to believe
20 that DEXTER HUBERT WHITE posed the risk of death, or serious bodily injury
21 to any person.

22 21. Defendants engaged in actions intended by them to cause injury to
23 DEXTER HUBERT WHITE. Discharging over several gunshots at a single
24 unarmed individual posing no threat is clearly malicious and at the very least
25 oppressive. These actions by said Defendants and said DOE Defendants were in
26 conscious disregard of the rights and safety of DEXTER HUBERT WHITE.

27 **FIRST CAUSE OF ACTION**

28 **VIOLATION OF CIVIL RIGHTS – EXCESSIVE FORCE**

[42 U.S.C. §1983]

(By Plaintiff against all Defendants)

22. Plaintiff realleges all prior paragraphs of this complaint and incorporates the same herein by this reference.

23. Plaintiff is informed, believes, and therefore alleges, that on or about January 11, 2018, Officer CORY MCMICHAEL, Officer JAVIER TAFOYA and DOE Defendants, and each of them, assaulted, and shot DEXTER HUBERT WHITE as previously described, all of which constituted excessive, unjustifiable, and unreasonable force in violation of and with deliberate indifference to DEXTER HUBERT WHITE'S Fourth Amendment right to be free from unreasonable searches and seizures.

24. The above articulated constitutional violations were proximately caused by the Defendants', COUNTY, CITY, and LAPD'S deliberate indifference to the maintenance, training, and control of the LAPD officers, CORY MCMICHAEL, JAVIER TAFOYA and said DOE Defendants.

25. Additionally, DOE Defendants have engaged in a well-known pattern and practice of misconduct in violation of the Constitution and federal law in a number of ways, including: the use of unreasonable force in violation of the Fourth Amendment as recognized by the United States Department of Justice.

26. The injuries and constitutional violations set forth herein were proximately caused by the customs, practices, policies and decisions of Defendants COUNTY, CITY, and LAPD including, but not limited to, inadequately training and supervising and failing to provide a different kind of training to LAPD and its officers, with respect to the reasonable and proper use of deadly force against civilians.

27. Plaintiff is informed and believes, and thereupon alleges, that on or before January 11, 2018, the COUNTY, the CITY, and LAPD hired, trained, supervised, employed and/or managed the individual officers, with conscious disregard of an deliberate indifference to the constitutional rights of third parties, in that it was plainly obvious to said Defendants that these officers were dangerous

1 and violent employees, prone to fire their firearms without reasonable justification,
2 and in a manner that demonstrates callous disregard for the rights and safety of
3 third parties, and conduct assault and battery on persons and/or use unnecessary,
4 unreasonable, deadly, and/or unlawful physical force without reasonable
5 justification. Because adequate scrutiny of these individual CORY MCMICHAEL,
6 JAVIER TAFOYA and DOE Defendants' background would have led the
7 COUNTY, CITY, and LAPD to conclude that the plainly obvious consequence of
8 the decision to hire these individual DOE Defendants, CORY MCMICHAEL and
9 JAVIER TAFOYA would be the deprivation of a third party's Fourth Amendment
10 right to be free from unreasonable and excessive force, the COUNTY, CITY,
11 LAPD were deliberately indifferent to Plaintiff's federally protected rights when
12 the individual Defendants named herein were hired, retained, and later
13 inadequately supervised.

14 28. As set forth in the foregoing paragraphs of this Complaint, the
15 Defendants' shooting of DEXTER HUBERT WHITE was an unconstitutional
16 display of unreasonable, excessive and deadly force, which violated DEXTER
17 HUBERT WHITE'S Fourth Amendment right to be free from unreasonable
18 seizures. Plaintiff is informed and believes, and thereupon alleges the details of this
19 incident have been revealed to the authorized policymakers within the COUNTY
20 and the CITY, and LAPD and that such policymakers have direct knowledge of the
21 fact that the shooting of DEXTER HUBERT WHITE was unjust and represented
22 an unconstitutional display of unreasonable, excessive and deadly force.
23 Notwithstanding this knowledge, the authorized policymakers within the
24 COUNTY, CITY, AND LAPD had approved of the Defendants, and each of them
25 individually, shooting of DEXTER HUBERT WHITE, and have made a deliberate
26 choice to endorse the Defendants, and each of them individually, shooting of
27 DEXTER HUBERT WHITE, and the basis for that shooting. By so doing, the
28 authorized policymakers within the COUNTY, CITY, and LAPD have shown

1 affirmative agreement with the individual Defendant's actions, and have ratified
2 the unconstitutional acts of the individual Defendant officers.

3 29. These policies and custom in failing to supervise and train said
4 individual Defendants were the moving force and the reason behind the individual
5 Defendants violation of Plaintiff's constitutional rights.

6 30. Despite the fact that COUNTY, CITY, and LAPD knew or should
7 have known of the fact that these acts, omissions, decisions, practices, customs and
8 policies, both formal and informal, were being carried out by its agents and
9 employees, COUNTY, CITY, and LAPD have taken no steps or efforts to prevent
10 this course of conduct, nor to make redress to the Plaintiff, and have failed to take
11 any disciplinary action whatsoever against any of its employees or agents.

12 31. Upon information and belief, Defendants with deliberate indifference
13 to and/or reckless disregard for the safety and constitutional rights of Plaintiff and
14 other citizens, maintained, enforced, tolerated, ratified, permitted, and acquiesced
15 in, and/or applied unconstitutional policies, practices, customs, including, but not
16 limited to:

- 17 (a). Subjecting citizens, including Plaintiff, to unreasonable use of
18 force against their persons;
- 19 (b). The failure to institute, require, and enforce proper and adequate
20 training, supervision, policies and procedure concerning applying
21 force. Specifically, failure to train Defendants on the use of non
22 lethal weapons where citizens do not pose any threat, further
23 failure to train Defendants to individually determine the need for
24 force themselves instead of proceeding with lethal force upon
25 arrival to a scene.
- 26 (c). By allowing, tolerating, and/or encouraging CITY and COUNTY
27 employees to make false reports and/or make false statements to
28 justify the unreasonable force. Defendants here made false police

1 reports and statements regarding the incident to justify their
2 unreasonable use of force.

3 (d). To allow, tolerate, and encourage a “code of silence” among law
4 enforcement officers and Defendants whereby an officer does not
5 provide adverse information against a fellow officer.

6 (e). The cover up of violations of constitutional rights by any or all of
7 the following:

8 i. By failing to properly investigate and/or evaluate complaints
9 or incidents related to the claimed customs, policies and
10 procedures identified above.

11 ii. By ignoring and/or failing to properly and adequately
12 investigate and discipline unconstitutional or unlawful
13 activity by CITY, COUNTY, LAPD employees.

14 iii. By providing false reports and/or statements.

15 32. The above acts or omission of acts of the Defendants and the
16 individual Defendants were undertaken while under color of state law and resulted
17 in the violation of Plaintiff’s constitutional rights, as stated herein. Likewise, the
18 customs, practices, policies, and decisions of the COUNTY, CITY, and LAPD
19 alleged herein and as applied to DEXTER HUBERT WHITE, resulted in violation
20 of Plaintiff’s constitutional rights.

21 33. DEXTER HUBERT WHITE had the right to be free from
22 unreasonable searches and seizures, and the right to be free from the use
23 of unreasonable and excessive force. These rights and privileges are
24 secured to DEXTER HUBERT WHITE by the provisions of the Fourth
25 Amendment to the United States Constitution, and by 42 U.S.C. §1983.
26 All of these interests were implicated by the wrongful conduct of the
27 Defendants which proximately caused the injuries sustained by DEXTER
28 HUBERT WHITE.

1 34. Each of the individual Defendants, and the municipal Defendants
2 acted willfully, knowingly, with reckless disregard and deliberate indifference to
3 the known consequences of their acts and omissions, and purposefully with the
4 intent to deprive Plaintiff of his federally protected rights and privileges, and did in
5 fact violate those rights and privileges, entitling Plaintiff to punitive and exemplary
6 damages in an amount to be proven at the trial of this matter.

7 35. As a direct and proximate result of the aforesaid acts, omissions,
8 customs, practices, policies and decisions of the Defendants and each of them,
9 Plaintiff DEXTER HUBERT WHITE has suffered great mental and physical pain,
10 anguish, fright, nervousness, anxiety, grief, shock, humiliation, indignity,
11 embarrassment and apprehension all to his damage in a sum to be determined at
12 trial. Additionally, Plaintiff has been forced to incur substantial amounts for
13 attorney's fees and other expenses in the prosecution of the above-articulated
14 constitutional violations.

15 36. Plaintiff is entitled to and hereby demand costs, attorney fees
16 and expenses pursuant to 42 U.S.C. §1988.

17 37. By reason of the aforementioned acts and omissions of acts of
18 Defendants, and each of them, Plaintiff has suffered severe mental anguish,
19 emotional distress, and financial losses as alleged.

20 **SECOND CAUSE OF ACTION**

21 **Violation of California Civil Code § 43, 52.1;**

22 **California Constitution, Article 1, §13**

23 **(By Plaintiff against all Defendants)**

24 38. Plaintiff realleges all prior paragraphs of this complaint and incorporates
25 the same herein by this reference.

26 39. Plaintiff brings this action and is set forth herein to redress the
27 deprivation, under color of statute, ordinance, regulation, policy, custom, practice
28 or usage of a right, privilege, and immunity secured to DEXTER HUBERT

1 WHITE by the Constitution of the State of California and the California Civil
2 Code, §§ 43 and 52.1.

3 40. At all times mentioned herein, the Defendants COUNTY and CITY
4 employed the individual Defendants herein. Said Defendants COUNTY, CITY,
5 and LAPD provided its individual Defendant employees and agents with official
6 badges and identification cards which designated and described the bearers as
7 employees of the COUNTY and CITY.

8 41. During all times mentioned herein, the individual Defendants, and
9 each of them, separately and in concert, acted under color and pretense of law,
10 under color of statutes, ordinances, regulations, policies, practices, customs and
11 usages of the COUNTY and CITY. Each of the individual Defendant Officers
12 herein, separately and in concert, deprived DEXTER HUBERT WHITE of the
13 rights, privileges and immunities secured to him by the Constitution of the State of
14 California, Article 1, section 13, as well as the California Civil Code, §§ 43 and
15 52.1.

16 42. Plaintiff is informed, believes and therefore alleges, that on or about
17 January 11, 2018, DOE Defendants CORY MCMICHAEL and JAVIER TAFOYA
18 assaulted, battered, and shot DEXTER HUBERT WHITE as previously described,
19 all of which constituted excessive, unjustifiable, and unreasonable force in
20 violation of and with deliberate indifference to DEXTER HUBERT WHITE'S
21 statutory and constitutional right to be free from unreasonable searches and
22 seizures. Further, the violent conduct of DOE Defendants as described herein,
23 directly interfered with DEXTER HUBERT WHITE'S constitutional and
24 statutorily guaranteed rights.

25 43. DEXTER HUBERT WHITE had the rights to be free from unreasonable
26 search and seizures, and the right to be free from the use of unreasonable and
27 excessive force. These rights and privileges are secured to DEXTER HUBERT
28 WHITE by the provisions of the California Constitution, Article 1, section 13, and
by California Civil Code §§ 43 and 52.1. All of these interests were implicated by

1 the wrongful conduct of the individual Defendants which proximately caused the
2 injuries sustained by DEXTER HUBERT WHITE.

3 44.Plaintiff DEXTER HUBERT WHITE's right as secured by California
4 Civil Code §43 to be free from bodily restrains and harm from injury to his person
5 was violated by Defendants and each of them.

6 45.Plaintiff DEXTER HUBERT WHITE's right as secured by California
7 Constitution Article 1 Section 13 to be secure in his persons, and effects against
8 unreasonable seizures was violated by Defendants, and each of them.

9 46.By drawing rifles and weapons issued by the CITY, COUNTY, and
10 LAPD upon Plaintiff who posed no threat, Defendants acted to intimidate Plaintiff
11 and interfered with his rights secured by the Constitution in violation of California
12 Civil Code §52.1.

13 47.Each of the individual Defendants and the municipal Defendants acted in
14 concert, acted outside the scope of his/her jurisdiction and without authorization of
15 law and each of the individual Defendants, separately and in concert, acted
16 willfully, knowingly, with reckless disregard and deliberate indifference to the
17 known consequences of their acts and omission of acts, and purposefully with the
18 intent to deprive DEXTER HUBERT WHITE and civilian citizens of their
19 protected rights and privileges, and did in fact violate those rights and privileges,
20 entitling Plaintiff to statutory, punitive and exemplary damages against the
21 individual Defendants, in an amount to be proven at the trial of this matter
22 pursuant to Cal. Civil Code §§52 et seq., 52.1(b), and 52.1(h).

23 48.As a direct and proximate result of the aforesaid acts, omission of acts,
24 customs, practices, policies and decisions of the Defendants and each of them,
25 Plaintiff suffered great mental and physical pain, suffering, anguish, fright,
26 nervousness, anxiety, grief, shock, humiliation, indignity, embarrassment and
27 apprehension all to his damage in a sum to be determined at trial. Additionally,
28 Plaintiff has been forced to incur substantial amounts for attorneys' fees and other
expenses in the prosecution of the above-articulated violations.

1 49.As a further result of these acts, Plaintiff has lost past and future earnings
2 and wages in an amount to be determined according to proof at trial.

3 50.Plaintiff is entitled to and hereby demand costs, attorney fees
4 and expenses pursuant to California Civil Code §§ 52 et seq. and 52.1(h).

5
6 **THIRD CAUSE OF ACTION**
7 **ASSAULT AND BATTERY**
8 **(By Plaintiff Against Individual Defendants)**

9
10 37. Plaintiff realleges all the foregoing paragraphs, as well as any
11 subsequent paragraphs contained in the complaint, as if fully set forth herein.

12 38. Defendant CORY MCMICHAEL, JAVIER TAFOYA, and DOE
13 Defendants intentionally and spitefully committed the above acts of battery
14 against Decedent DEXTER HUBERT WHITE.

15 39. Defendant CORY MCMICHAEL, JAVIER TAFOYA and Doe
16 Defendants, acting within the scope of their employment as officers with Los
17 Angeles Police Department in and for the County of Los Angeles and City of Los
18 Angeles, assaulted and battered Plaintiff DEXTER HUBERT WHITE causing
19 his unfortunate severe physical injuries.

20 40. By the conduct alleged above including, but not limited to, multiple
21 gunshot wounds, Defendant CORY MCMICHAEL, JAVIER TAFOYA and Doe
22 Defendants are liable for assault and battery.

23 41. Officer CORY MCMICHAEL, JAVIER TAFOYA and Doe
24 Defendants intentionally shot, and assaulted Plaintiff, with the intent to harm
25 him.

26 42. Plaintiff did not consent to the conduct and a reasonable person in
27 plaintiff's position would have been offended by the conduct of the officers. The
28 individual officers' actions were excessive and unreasonable.

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JURY DEMAND

Trial by jury of all issues is demanded.

DATED: January 10, 2019

Respectfully Submitted,

/s/ George G. Mgdesyan
George G. Mgdesyan, Esq.
Attorney for Plaintiff